



A Confederation of the Salish,
Pend d' Oreille
and Kootenai Tribes

THE CONFEDERATED SALISH AND KOOTENAI TRIBES
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**Div. of Policy, Perf. &
MGMT. Programs**

May 9, 2016

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Public Comments Processing

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U. S. Fish and Wildlife Service

MS: BPHC

5275 Leesburg Pike Road

Falls Church, Virginia 22041-3803

To Whom It May Concern:

This letter is a comment from the Confederated Salish and Kootenai Tribes of the Flathead Nation regarding the U. S. Fish and Wildlife Service's Proposal to De-List the Grizzly Bear in the Greater Yellowstone Ecosystem. We appreciate the opportunity to provide comments on this proposal.

The grizzly bear is a species of great spiritual, cultural and ecological significance to the people of the Confederated Salish, Kootenai and Pend d'Oreille Tribes. Grizzly bears have been revered by our people since time immemorial, and they continue to be so honored today, both here on the Flathead Indian Reservation and elsewhere throughout their geographical range and our aboriginal territory. As a result, we view this proposal with a great deal of interest and concern since much of the Greater Yellowstone area overlays our aboriginal territory, and we retain treaty rights in the area under the provisions of the Treaty of the Hellgate of 1855 between our ancestors and the federal government. We are also very interested in and concerned about the U. S. Fish and Wildlife Service's proposed de-listing of the Greater Yellowstone Ecosystem grizzly bear population, given the controversy and the divergent viewpoints involved with the issue.

We received a good briefing of the de-listing proposal from Dr. Christopher Servheen, the Service's former Grizzly Bear Recovery Coordinator as a government-to-government consultation in 2015 and again on April 26, 2016. The staffs of our Wildlife Management Program, the Kootenai Culture Committee and the Salish Pend d'Oreille Culture Committee have reviewed the de-listing proposal, as well as the Conservation Strategy for the Greater Yellowstone Ecosystem Grizzly Bear Population. Through that review process and their recommendations, we wish to express the following concerns and suggestions.

Recovering a wildlife species to a level that provides a sound opportunity for long-term population viability is the goal of the Endangered Species Act. The efforts to achieve recovery in this case have been very successful and are very laudable. After review of the data utilized to support the de-listing proposal, we concur that the biological population goals for recovery of the grizzly bear within the Greater Yellowstone Ecosystem have been met. We base this concurrence on the data presented in the proposal and our thorough analysis of that data. We further believe that the U. S. Fish and Wildlife Service completed a thorough review of potential limiting factors and potential problems that may arise in the Ecosystem in the future. Furthermore, the commitments agreed to by the various governmental entities that will manage grizzly bears, their habitat and potential limiting factors after de-listing occurs provide a sound level of ongoing protection for the bear and its habitat. In addition, the contingency plans for re-listing if the need arises and the criteria for doing so are also commendable.

We are, however, very concerned and we wish to express our strong opposition to any plans for sport and/or recreational hunting of grizzly bears that may arise from state wildlife management agencies in Montana, Idaho and Wyoming. Evidence of these state plans include Montana Fish, Wildlife and Parks' announcement last week of its intention to establish hunting districts and seasons for the Greater Yellowstone Ecosystem and adjacent areas. We are aware that Wyoming and Idaho have similar plans. With that in mind, The Confederated Salish and Kootenai Tribes wish to express our strong opposition to the Service's proposal to de-list the Greater Yellowstone Ecosystem Grizzly Bear population, primarily due to the inclusion of the three states' hunting plans.

As noted above, grizzly bears are a species of high reverence for tribal people, including our people and those of other tribes. For centuries, our people have lived in harmony with grizzly bears and have come to revere their power and strength in the natural world. Because of that reverence, we did not hunt them for food or for sport. That reverence was indicated by a position statement and resolution against the de-listing of the Greater Yellowstone grizzly bear population passed by the Rocky Mountains Tribal Leaders' Association. Those actions were approved by the Association with the specific concern about sport hunting of grizzly bears. In addition, numerous tribes throughout the United States have expressed similar opposition. We, as a tribal government, support that resolution.

In conclusion, we wish to strongly reiterate that, while we support and commend the many ongoing management actions by many agencies in the Greater Yellowstone Ecosystem on behalf of the grizzly bear population, we adamantly oppose the proposal to de-list the grizzly bear there due to our strong opposition to the inclusion of plans for sport hunting of the population.

Sincerely,

Confederated Salish and Kootenai Tribes

Len Swolbeth, Vice Chair

Vernon S. Finley, Chairman

Tribal Council